

# **EXHIBIT B**

**From:** [Jason Miller](#)  
**To:** [Noa, Jesse L.](#)  
**Subject:** RE: Chow v. Canyon Bridge  
**Date:** Friday, June 20, 2025 6:05:00 PM  
**Attachments:** [image001.png](#)

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Jesse,

I will call you on Monday at 12.

Best,  
Jason

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**From:** Noa, Jesse L. <jnoa@potteranderson.com>  
**Sent:** Friday, June 20, 2025 5:49 PM  
**To:** Jason Miller <jm@skjlaw.com>  
**Subject:** Re: Chow v. Canyon Bridge

EXTERNAL EMAIL

Jason,

I have availability on Monday from 12:00-1:00 and 3:30-4:30. I should have some more availability on Monday but am waiting on some other scheduling issues to be resolved and can follow up if those times do not work.

Best,

Jesse

**Jesse L. Noa** | Partner



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**From:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Sent:** Friday, June 20, 2025 5:39:14 PM

**To:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>

**Subject:** [EXT] RE: Chow v. Canyon Bridge

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Jesse,

Given the short timeframe that we are operating on, I really need to have a meet and confer telephone call with you (that will not take more than a few minutes). I am available tonight and all weekend, so I would appreciate you providing your availability for a brief phone call. We will need to discuss some dates next week when the Court can hold a teleconference so please be prepared to let me know what dates work on your end.

Best,  
Jason

---

**From:** Jason Miller

**Sent:** Friday, June 20, 2025 4:32 PM

**To:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>

**Subject:** RE: Chow v. Canyon Bridge

Jesse,

Thank you for the consideration but given that Mr. Chow has not yet retained new counsel he could not make the representation that "the discovery will be substantively and fully responded to and that [he] will be prepared to begin producing documents on July 14."

Accordingly, I think we are at the juncture where we need to have a telephonic discussion so that I can satisfy Rule 7.1.1. Please let me know when you are free for a call.

Best,  
Jason

---

**From:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>

**Sent:** Friday, June 20, 2025 3:09 PM

**To:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>

**Subject:** RE: Chow v. Canyon Bridge

EXTERNAL EMAIL

Jason,

I've conferred with co-counsel regarding your request for an extension. Given the present deadlines, including the August 2 fact discovery deadline, we believe there is a high risk of prejudice of receiving untimely or incomplete discovery from plaintiff on the timeline you propose. While we would not oppose your client's request to the Court for an extension, we'd need to first receive representations from your client that the discovery will be substantively and fully responded to and that your client will be prepared to begin producing documents on July 14. Otherwise, we are concerned that either Mr. Chow, or new counsel if he seeks substitution, will either provide incomplete discovery or present another request for an extension at or around July 14. Please let us know if your client can provide those representations.

Best,

Jesse

Jesse L. Noa | Partner



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**From:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Sent:** Friday, June 20, 2025 2:57 PM  
**To:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Subject:** [EXT] RE: Chow v. Canyon Bridge

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Jesse,

Following up on a voicemail I just left you. I would really appreciate a response on our request for an extension of the time to respond to discovery. If your side will not agree to an extension, then we will need to proceed with a motion for an extension. So, in either event, please give me a

call so that we can hold our meet and confer consistent with Rule 7.1.1. I am available the rest of the day and can speak over the weekend if needed.

Best,  
Jason

SKJ\_Logo2015\_email



**Jason Miller**

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1000 West Street, Suite 1501 | P.O. Box 410  
Wilmington, DE 19899  
302.504.1658 Direct | 302.652.8400 Main  
[jmiller@skjlaw.com](mailto:jmiller@skjlaw.com) | [www.skjlaw.com](http://www.skjlaw.com)

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**From:** Jason Miller  
**Sent:** Friday, June 20, 2025 10:17 AM  
**To:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Subject:** RE: Chow v. Canyon Bridge

Jesse,

I am following up on this. Thanks.

---

**From:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Sent:** Wednesday, June 18, 2025 1:10 PM  
**To:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Subject:** RE: Chow v. Canyon Bridge

EXTERNAL EMAIL

Jason,

Thanks for following up. I'm hopeful to have a response to you later today/tomorrow.

Best,

Jesse

**Jesse L. Noa | Partner**



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**From:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Sent:** Tuesday, June 17, 2025 11:55 AM  
**To:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Subject:** [EXT] RE: Chow v. Canyon Bridge

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Jesse,

I wanted to check in following our discussion last week and see whether your side is agreeable to a two-week extension for the discovery responses.

Best,  
Jason

---

**From:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Sent:** Friday, June 13, 2025 1:10 PM  
**To:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Subject:** Re: Chow v. Canyon Bridge

EXTERNAL EMAIL

That works.

**Jesse L. Noa** | Partner



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**From:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Sent:** Friday, June 13, 2025 12:47:31 PM  
**To:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Subject:** [EXT] RE: Chow v. Canyon Bridge

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**\*\***

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Can we make it 4?

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**From:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Sent:** Friday, June 13, 2025 12:43 PM  
**To:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Subject:** RE: Chow v. Canyon Bridge

EXTERNAL EMAIL

Sure. I can get on a call at 3.

**Jesse L. Noa** | Partner



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**From:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Sent:** Friday, June 13, 2025 12:32 PM  
**To:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Subject:** [EXT] RE: Chow v. Canyon Bridge

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Jesse,

Do you have time today for a quick call? I only need a few minutes.

Thanks,  
Jason

---

**From:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Sent:** Wednesday, June 4, 2025 2:01 PM  
**To:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Subject:** RE: Chow v. Canyon Bridge

EXTERNAL EMAIL

Sure, now is fine.

**Jesse L. Noa** | Partner



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**From:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Sent:** Wednesday, June 4, 2025 2:00 PM  
**To:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Subject:** [EXT] RE: Chow v. Canyon Bridge

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Thanks, Jesse. Are you free to hop on a quick call because I think we have to for Rule 7.1.1?

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**From:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Sent:** Wednesday, June 4, 2025 1:54 PM  
**To:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Subject:** RE: Chow v. Canyon Bridge

EXTERNAL EMAIL



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Jason,

Thanks for the email and for providing the drafts. We do not oppose the motion.

Best,

Jesse

**Jesse L. Noa | Partner**



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**From:** Jason Miller <[jm@skjlaw.com](mailto:jm@skjlaw.com)>  
**Sent:** Tuesday, June 3, 2025 7:23 PM  
**To:** Noa, Jesse L. <[jnoa@potteranderson.com](mailto:jnoa@potteranderson.com)>  
**Subject:** [EXT] Chow v. Canyon Bridge

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Jesse,

I hope this email finds you well.

Please see attached for a motion to withdraw my firm's appearance, as well as the appearance of my co-counsel, Wrobel Markham, on behalf of plaintiff in this action. I would appreciate it if you would please review this at your earliest convenience and let me know your availability tomorrow for a telephone call so we can satisfy our Rule 7.1.1 obligation to meet and confer before filing. Additionally, you will see that I set the motion up to indicate that defendants do not oppose the motion. I would appreciate it if you could let me know defendants' position on the motion tomorrow during our call so I can know whether to indicate the motion is opposed/unopposed.

Best,  
Jason

SKJ\_Logo2015\_email

**Jason Miller**

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Wilmington, DE 19899

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